

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

**IN RE: NATIONAL COLLEGIATE
ATHLETIC ASSOCIATION STUDENT-
ATHLETE CONCUSSION LITIGATION**

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MDL No. 2492

Master Docket No. 1:13-cv-09116

Judge John Z. Lee

Magistrate Judge M. David Weisman

JOINT MOTION FOR ENTRY OF REVISED SCHEDULE

The Settlement Class Representatives and Defendant National Collegiate Athletic Association (the “NCAA”, and together with Settlement Class Representatives, the “Parties”) respectfully request that the Court enter a revised schedule for the consideration of final approval of the Second Amended Class Action Settlement Agreement and Release, any objections thereto, and any requests for payment of attorneys’ fees and costs.¹ In support thereof, the Parties state as follows:

1. On July 5, 2017, the Notice Administrator informed the Parties that the mailing of direct notice would be completed by July 21, 2017. At a July 7, 2017 hearing, the Parties informed the Court of the Notice Administrator’s estimated completion date for the mailing of direct notice and suggested that the deadline for Settlement Class Members to object or opt out of the Settlement be reset to August 18, 2017. On July 7, 2017, the Court entered an Order setting an August 18, 2017 deadline for Settlement Class Members to object or opt out and

¹ Unless otherwise defined, capitalized terms have the meaning ascribed to them in the Second Amended Settlement Agreement, which is Exhibit 1 to the joint motion for preliminary approval filed with the Court on May 20, 2016. See Second Am. Settlement Agt.

resetting certain other deadlines related to the consideration of final approval of the Settlement.
See Minute Order (Dkt. #426).

2. On July 19, 2017, the Notice Administrator informed the Parties that the mailing of direct notice will not be completed until August 2, 2017. The Notice Administrator also informed the Parties that the delay is due to unanticipated challenges involving the format in which certain Settlement Class Member contact information was submitted to the Notice Administrator, which, in turn, required more work to clean and prepare the data for mailing than the Notice Administrator previously anticipated. The Notice Administrator has assured the Parties that it will complete the mailing of direct notice by August 2, 2017.

3. As the mailing of direct notice will not be completed before August 2, 2017, the Parties respectfully request that the deadlines set forth in the Court's July 7, 2017 Minute Order (Dkt. #426) be revised as follows:

Action	Date Set Forth in July 7, 2017 Minute Order	Proposed New Date
Deadline for Settlement Class Members to object to or opt out of the Settlement	August 18, 2017	September 15, 2017
Deadline for any objections or responses to the petitions for attorneys' fees and costs	August 18, 2017	September 15, 2017
Notice Administrator shall file with the Court the Opt-Out List with an affidavit attesting to the completeness and accuracy thereof	August 25, 2017	September 29, 2017
Notice Administrator shall file declarations with the Court concerning implementation of the Notice program and other terms of the Settlement	August 25, 2017	September 29, 2017
Deadline for filing Motion for Final Approval of the Settlement, including any responses to objections	August 25, 2017	September 29, 2017

Fairness Hearing	September 22, 2017 at 10:00 a.m.	At the Court's convenience on or after October 27, 2017
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WHEREFORE, the Parties respectfully request that the Court enter the revised schedule.

A Proposed Order is attached hereto. The Parties further request whatever other relief the Court deems appropriate.

Dated: July 28, 2017

Respectfully submitted,

By: /s/ Steve W. Berman (w/ consent)
Co-Lead and Settlement Class Counsel

By: /s/ Johanna M. Spellman
Liaison Counsel for Defendant
National Collegiate Athletic Association

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CERTIFICATE OF SERVICE

I, Johanna M. Spellman, certify that on July 28, 2017, a true and correct copy of the foregoing JOINT MOTION FOR ENTRY OF REVISED SCHEDULE was filed through the CM/ECF system, which caused notice to be sent to all counsel of record.

/s/ Johanna M. Spellman _____

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